

March 23, 1998

Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP
Room 4007-S. Ag Stop 0275
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RE: Docket Number TMD-94-00-2

I am dismayed and alarmed with the USDA's proposed organic standards. I support the proposed rules the National Organic Standards Board came up with for organic farming.

In regard to Section 205.20-205.28:

Please write the rule governing the use of synthetics in organic farming according to NOSB recommendations and recognize NOSB's authority as granted by Congress.

In regard to Section 205.103:

Alternative labels should NOT be prohibited. USDA should stay out of the labeling business. If you are going to allow genetically modified organisms in organic food, then I want an alternative label that tells me the food does NOT contain genetically modified organisms. How else will I know what I am eating? Taking away alternative labeling is doing away with free speech. Stay out of the labeling issues.

In regard to Section 205.421-205.424:

Small organic farmers are the very backbone of the entire organic movement. To deny them access to the certification process by making the fees ridiculously high looks suspiciously like a corporate conspiracy with the government deeply involved. Agri-business cannot supply us with organic food because they do not understand any of the philosophy behind the movement. Organic farmers do not pay attention to money first, they pay attention to caring for the land and the future of that land first. Agri-business pays attention only to money. Your fee structure favors agri-business and squeezes out the small farmer. Small scale farmers' fees should be much lower than agri-business fees. To lose our small scale organic farmers is to lose true organically grown food...and possibly the healthy land on which it is grown. Our country cannot afford to lose these two vital links to our future health.

In regard to Sections 205.13-205.15, 205.22, 205.24:

Mad cow disease is on the rise not only in other countries, but in wild animals in our own country. It has been scientifically proven that it can cross species barriers. We should not be turning our cattle into cannibals, else we doom ourselves. Further, we should be limiting the use of antibiotics, providing our animals more access to the outdoors and treating them in every instance with much greater care than the proposed USDA rules invite. The entire premise of organic farming is DO NO HARM. USDA has completely ignored this tenant, which is the very foundation of organic farming. Follow the NOSB proposals with regard to animals.

With regard to Sections 205.2, 205.7-205.9, 205.17, 205.22, 205.26:

NOSB prohibited broad categories of materials that are currently proposed to be allowed by USDA. I do not want to be eating genetically engineered organisms, and further not to know that I am eating them because of incomplete labeling. I don't want my food grown in sewage sludge and I don't want it irradiated. Food labeled "organic" should not contain genetically engineered organisms, or be grown in sludge or be irradiated and the public has come to expect that none of these things has been done to organically grown food. To allow this would be a grave miscarriage of public trust and it makes me very angry that you would even consider such an outrageous move.

Please do not allow genetically engineered organisms in organically grown food. Please do not allow organically grown food to be grown in sewage sludge (high in heavy metals which are taken up by plants.) Please do not allow organic food to be irradiated (it destroys vitamin content of food).

With great concern,